

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

PENNYMAC LOAN SERVICES, LLC

PLAINTIFF

VS

CIVIL ACTION NO.: 2:19-cv-00193-HSO-MTP

**INNOVATED HOLDINGS, INC. dba SITCOMM
ARBITRATION ASSOCIATION; MARK MOFFETT;
SANDRA GOULETTE; RONNIE KAHAPEA; MARK
JOHNSON, KIRK GIBBS, BRETT "EEON" JONES aka
EEON aka BRETT JONES aka BRETT TORIANO
JONESTHEOPHILIOUS aka BRETT RANDOFF TORIANO
KEEFFE HENRY KANA-SHAPHEL HITHRAPES JONES-
THEOPHILUS fka KEEFE BRANCH; and RANCE MAGEE**

DEFENDANTS

**APPLICATION TO CLERK FOR ENTRY OF DEFAULT
RE: SANDRA GOULETTE AND SUPPORTING AFFIDAVIT**

The Plaintiff, PennyMac Loan Services, LLC, respectfully requests the Clerk to enter default against the Defendant, Sandra Goulette, in the above-captioned action for failure to answer or otherwise defend against the First Amended Complaint in this case, as set forth in the Affidavit attached hereto as Exhibit 1.

RESPECTFULLY SUBMITTED this the 22nd day of June, 2021.

UPSHAW, WILLIAMS, BIGGERS,
& BECKHAM, LLP

By: /s/ Harris F. Powers III
HARRIS F. POWERS III, MBN: 100331
STEVEN C. COOKSTON, MBN: 99137
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CERTIFICATE OF SERVICE

The undersigned Harris F. Powers III, counsel for Penny Mac Loan Services, LLC verifies that on this day he caused to be served a copy of this pleading by mailing same via U.S. Mail, postage prepaid, pursuant to F.R.C.P. 5, unto the following:

Ronnie Louis Marvel Kahapea
P.O. Box 875
Volcano, HI 96785

Sandra Goulette
3007 Crescent Hill Drive
Laurel, MS 39440

Mark Johnson
451 May Lane
Louisa, VA 23093

Kirk Gibbs
4155 Lawrenceville Hwy, PMB 8119
Lilburn, GA 30047

This the 22nd day of June, 2021.

/s/ Harris F. Powers III
HARRIS F. POWERS III